



U.S. Department of Justice

*United States Attorney  
Southern District of New York*

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*The Jacob K. Javits Federal Building  
26 Federal Plaza  
New York, New York 10278*

June 6, 2024

**BY ECF**

Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall U.S. Courthouse  
40 Foley Street  
New York, New York 10007

**Re:    *United States v. Joshua Adam Schulte,*  
      17 Cr. 548 (JMF)**

Dear Judge Furman:

The Government respectfully submits this letter pursuant to the Court's orders docketed as docket entry numbers 1139 and 1141. Attached to this letter are redacted, unclassified transcripts of proceedings held pursuant to the Classified Information Procedures Act ("CIPA"), 18 U.S.C. App. 3, on May 3, 2022; June 8, 2022; June 13, 2022; and July 22, 2022.

The Government does not propose further redactions to the attached transcripts. Though in other cases involving classified CIPA proceedings, it may be typical that the unclassified portions of transcripts of proceedings are so intertwined with, and inextricable from, the classified proceedings as to make redaction impracticable or rendering redacted transcripts unintelligible or misleading, the Government concludes that the nature of the proceedings in these particular conferences do not create those problems. This was due, we believe, in part to the fact that some proceedings were focused predominately on legal or procedural matters that, while implicating classified information, did not require discussion of the underlying classified information or required only discrete descriptions of classified information readily addressed through redaction. Another consideration is that these proceedings involved a *pro se* defendant who had previously disclosed and attempted to disclose classified information and posed an unusually high risk of

